

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
	:	Chapter 13
JANAEA NOLEN	:	
	:	Case No. 22-12963-AMC
Debtor.	:	

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**DEBTOR’S RESPONSE TO MOTION FOR RELIEF FROM STAY**

JANAEA NOLEN (the “Debtor”) by and through their undersigned counsel, hereby submits this Response to the Motion of Bank of America, N.A. (the “Movant”) for Relief from the Automatic Stay (the “Motion”), and in support thereof respectfully states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. It is specifically denied that the Debtor is in default under the terms of the Contract described in paragraph 3 of the Motion. By way of further response, the Debtor believes that numerous payments made post-petition were not properly credited to the Debtor’s account.
7. Denied. It is specifically denied that the outstanding balance under the Contract is \$13,068.36.
8. Denied. It is specifically denied that the value of the vehicle described in paragraph 4 of the Motion is \$18,525.00.
9. Denied. It is specifically denied that either (a) cause exists warranting relief from the automatic stay; or (b) the Movant lacks adequate protection warranting relief from the automatic stay under 11 U.S.C. § 362(d). By way of further response, it is once again specifically

denied that the Debtor defaulted under the terms of the Contract by failing to make post-petition payments to Movant.

WHEREFORE the Debtor respectfully requests this Honorable Court enter an Order denying the Motion for Relief from the Automatic Stay, and for such other and further relief as the Court deems just and appropriate.

Dated: June 8, 2023

Respectfully submitted,

/s/Brad J. Sadek, Esq  
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